

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

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LEVITICUS D. YOUNG
PLAINTIFF[S],
V.

DEFENDANT[S],
LAURENS COUNTY
SHERIFF OFFICE,
etal

COMPLAINT
CIVIL ACTION NO. —

I. JURISDICTION & VENUE

1. THIS IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983 TO REDRESS THE DEPRIVATION, UNDER COLOR OF STATE LAW, OF RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES. THE COURT HAS JURISDICTION UNDER 28 U.S.C. SECTION 1331 AND 1343(A)(3). PLAINTIFF SEEKS DECLARATORY RELIEF PURSUANT TO 28 U.S.C. SECTION 2201 AND 2202. PLAINTIFF CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY 28 U.S.C. SECTION 2283 AND 2284 AND RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE.

- 2). THE DISTRICT OF SOUTH CAROLINA IS AN APPROPRIATE VENUE UNDER 28 U.S.C. SECTION 1391(B)(2) BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO THIS CLAIM OCCURRED.

II. PLAINTIFF[S]

- 3). PLAINTIFF, LEVITICUS D. YOUNG IS AND WAS AT ALL TIMES MENTIONED HEREIN A DETAINEE OF THE STATE OF SOUTH CAROLINA IN THE CUSTODY OF THE GREENVILLE COUNTY DETENTION CENTER. I AM CURRENTLY CONFINED IN LEIBER CORRECTIONAL INSTITUTION, IN RIDGEVILLE SOUTH CAROLINA.

III. DEFENDANTS

- 4). DEFENDANT, DON REYNOLDS IS THE SHERIFF OF THE LAURENS COUNTY SHERIFF OFFICE. HE IS LEGALLY RESPONSIBLE FOR THE OVERALL OPERATION OF THE LAURENS COUNTY SHERIFF OFFICE AND EACH DEPARTMENT UNDER ITS JURISDICTION.

5). DEFENDANT, ANDREW T. DUTTON IS THE DEPUTY CHIEF OF LAUREN'S COUNTY SHERIFF OFFICE. HE IS LEGALLY RESPONSIBLE FOR THE OPERATION OF LAUREN'S COUNTY JAIL AND FOR THE WELFARE OF ALL THE DETAINEES OF/ IN THAT JAIL.

6). DEFENDANT, KEITH MCINTOSH, C. MARTIN, J. MCINTOSH IS A LAW ENFORCEMENT OFFICER OF THE LAUREN'S COUNTY SHERIFF OFFICE WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF LIEUTENANT AND WAS ASSIGNED TO LAUREN COUNTY SHERIFF OFFICE.

7). EACH DEFENDANT IS SUED INDIVIDUALLY AND IN HIS[OR HER] OFFICIAL CAPACITY. AT ALL TIMES MENTIONED IN THIS COMPLAINT, EACH DEFENDANT ACTED UNDER THE ~~LOVE~~ COLOR OF STATE LAW.

III. FACTS

8). ON OR ABOUT JANUARY 3, 2014 (LT KEITH MCINTOSH) ALONE WITH A SECOND LAW ENFORCEMENT OFFICER ARRIVED AT THE PLAINTIFFS HOME ADDRESS, WHICH AT THE TIME WAS (26 IOIA ST. GREENVILLE, S.C.) WITH A PHOTO COPY PHOTOGRAPH (LOOKING FOR THE PLAINTIFF. UPON NOTICE, PLAINTIFF WAS NOTIFIED BY SISTER (NAKISHA NICHOLSON) THAT (LAURENS COUNTY SHERIFF OFFICE) WAS LOOKING FOR HIM WITH WARRANTS. PLAINTIFF WAS BIASEDLY AND PREJUDICED PICKED OUT A PHOTO LINE UP ON NOVEMBER 19, 2013 BOTH VICTIM (DAVID A. WRIGHT) OF (SPRING ST. GRAY COURT S.C.), AND (LT CHRIS MARTIN) A LAURENS COUNTY INVESTIGATOR. ON OR ABOUT THE SAME LISTED ABOVE DATE JANUARY 3, 2014 PLAINTIFF CONTACT THE (LAURENS COUNTY SHERIFF OFFICE) IN REGARD TO THE HOME VISIT AND COULDN'T RECEIVE NOR CLAIN INFORMATION ON THE INVESTIGATION. ON July 18, 2014

9). PLAINTIFF WAS ARRESTED AND DETAINED IN THE GREENVILLE COUNTY DETENTION CENTER ON CRIMINAL CHARGES, THAT OCCURED IN THE GREENVILLE COUNTY AREA. NO BAIL! "UPON INFORMATION AND BELIEF." PLAINTIFF HAD DETAINER[S] IN (LAURENS COUNTY SHERIFF OFFICE) PLAINTIFF FILED THE NECESSARY PETITION REQUESTING TRUE BILL INDICTMENTS AND RIGHTFUL KNOWLEDGE OF ANY CHARGES BEING HELD AGAINST HIM. WHILE STILL REMAINED, DETAINED IN THE GREENVILLE COUNTY DETENTION CENTER. ON FEB 3, 2015 PLAINTIFF WAS TRANSFERED TO THE (LAURENS COUNTY SHERIFF'S OFFICE) BY (DEPUTY HUBER R. TOMLISON) OF THE (LAURENS COUNTY SHERIFF OFFICE). NUMBER (3177), TO HAVE WARRANTS SERVED ~~FOR~~ RESISTING ARREST, WARRANT NUMBER 2014A3010100016 THAT (LIKEITH MCINTOSH) STATED UNDER OATH, WHICH HE TIED UNDER, THE PLAINTIFF DID KNOWINGLY, AND WILLFULLY OPPOSE AND OR RESIST ARREST BY A LAW ENFORCEMENT OFFICER. VERY UNLAWFUL!!

AS WELL ON LARCENY / BREAKING
INTO MOTOR VEHICLE OR TANKS X4.
WHERE (L.J. MCINTOSH) SWORN
UNDER OATH THAT PLAINTIFF DID
BREAK OR ATTEMPT TO BREAK INTO
A VEHICLE BELONGING TO THE
VICTIM (WAYMON C. ROACH) WITH THE
INTENT TO STEAL. VERY PREJUDICE
AND UNLAWFUL. LIED UNDER OATH.
ON FEB 3, 2015 PLAINTIFF WAS BOOKED
INTO (LAURENS COUNTY SHERIFF OFFICE
DETENTION BY PRIVATE (DONNA MARIE
ALLOY-BAKER) NUMBER (2711). ON FAISE
DOCUMENTATION, TOOK BEFORE
(JUDGE TUCKER) AND GAVE A \$25,000
(BAIL) \$5,000 A PEICE. THIS BOOKING
PROCESS TOOK 2 DAYS. PAIN AND
SUFFERING, WALKING IN RESTRAINTS,
BEING STANDERED, GOT PLACED IN A
JAIL BIRD MUG SHOT PAPER WITHOUT
CONSENT. DEFAMATION!! ON FEB 4, 2015^(S)
PLAINTIFF RETURNED TO THE CUSTODY
OF GREENVILLE COUNTY WHERE I LATER
POSTED BAIL, AND AWAITED AN WRIT
STATEMENT FROM THE COURT TO SAY

- 10). PLAINTIFF IS ALLOWED TO GO FROM ONE COUNTY TO ANOTHER WITH A GPS LEG MONITOR ON THE ANKLE. PLAINTIFF REMAINED IN THE CUSTODY OF GREENVILLE COUNTY AN ADDITIONAL (62) DAYS AFTER POSTING BAIL FOR \$100,000 SPENDING NUMEROUS AMOUNTS OF MONEY ON CANTEEN AND PHONE TIME PAIN & SUFFERING, MENTAL PAIN & SUFFERING AND MEDICAL FEES. ON APRIL 10, 2015 PLAINTIFF WAS TRANSFERRED BACK INTO THE CUSTODY OF LAURENS COUNTY SHERIFF OFFICE TO SATISFY DETAINERS. AFTER BEING DETAINED, PLAINTIFF POSTED \$25,000 SURETY BOND AND LATER RELEASED FROM (LAURENS COUNTY SHERIFF OFFICE DETENTION). PLAINTIFF TRAVELED UP AND DOWN THE HIGHWAY, PAYING GAS EXPENSES TO GET TO AND FROM LAURENS COUNTY FOR ROLL CALL APPEARANCES AFTER APPEARANCE PLAINTIFF GOT VIOLATED AND TERMINATED FROM THE HOUSE ARREST PROGRAM FOR BEING LATE COMING FROM LAURENS County.

THROUGH ALL THE PAIN AND SUFFERING,
MENTAL PAIN AND SUFFERING, SLANDER, FALSE
IMPRISONMENT, AND DEFAMATION. PLAINTIFF
REMAINED HUMBLE, RESPECTFUL, AND
INNOCENT AGAINST ALLEGATIONS. UNUSUAL
PUNISHMENT IS UNUSUAL PUNISHMENT
AND SHOULD BE ACCEPTED. PLAINTIFF
FILED PETITION ADDRESS TO PUBLIC DEFENDER
(KATE KENDALL) (P.O. BOX 174 100 HILLCREST DR
SUITE P. LAURENS, S.C 29360). REQUESTING
THAT SHE FILE FOR A SPEEDY TRIAL ON
MY BEHALF FOR MY INNOCENTS. PLAINTIFF
ALSO STATED HE WOULD NOT PLEA TO THE
CHARGES, HE WANTED TRIAL. ON NOV 26,
2018 PLAINTIFF RECEIVED LEGAL MAIL
FROM THE PUBLIC DEFENDERS OFFICE
DATED NOVEMBER 19, 2018 INFORMING
PLAINTIFF THAT THE STATE HAS DISMISSED
THE CHARGES. PLAINTIFF'S CONSTITUTIONAL
RIGHTS WAS DEPRIVED AND SEEKS RELIEF
ON THIS COMPLAINT.

IV. EXHAUSTION OF LEGAL REMEDIES

- 11). PLAINTIFF LEVITICUS D. YOUNG PROPERLY UTILIZED THE LEGAL COURT SYSTEM FOR THE EIGHTH JUDICIAL CIRCUIT. FILING THE NECESSARY PETITIONS OR MOTIONS ON HIS OWN BEHALF UP UNTIL LEGAL COUNSEL WAS APPOINTED, TRYING SOLVE THE PROBLEM. ON OR ABOUT APRIL 26, 2015 PLAINTIFF LEVITICUS D. YOUNG PRESENTED FACTS RELATING TO THIS COMPLAINT. PLAINTIFF LEVITICUS D. YOUNG WAS NEVER SENT ANY RESPONSE FROM THE COURTS.

V. LEGAL CLAIMS

- 12). PLAINTIFF REALLEGIE AND INCORPORATE BY REFERENCE PARAGRAPHS 1-11.
- 13). THE FALSE IMPRISONMENT, SLANDER, DEFAMATION, MENTAL SUFFERING, DELIBERATE INDIFFERENCE TO MEDICAL NEEDS VIOLATED PLAINTIFF

LEVITICUS D. YOUNG RIGHTS
AND CONSTITUTED CRUEL AND UNUSUAL
PUNISHMENT AND A VIOLATION OF
DUE PROCESS UNDER THE 8TH
AND 14TH AMENDMENT TO THE
UNITED STATES CONSTITUTION.

- 14). THE PLAINTIFF HAS NO PLAIN, ADEQUATE
OR COMPLETE REMEDY AT LAW TO
REDRESS THE WRONGS DESCRIBED HEREIN.
PLAINTIFF HAS BEEN AND WILL CONTINUE
TO BE IRREPARABLY INJURED BY THE
CONDUCT OF THE DEFENDANTS UNLESS
THIS COURT GRANTS THE DECLARATORY AND
INJUNCTIVE RELIEF WHICH PLAINTIFF
SEEK.

VI. PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF RESPECTFULLY
PRAYS THAT THIS COURT ENTER JUDGEMENT
GRANTING PLAINTIFF:

- 15) A DECLARATION THAT THE ACT AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES.
- 16) A PRELIMINARY AND PERMANENT INJUNCTION ORDERING DEFENDANTS DON REYNOLDS (SHERIFF), ANDREW T. DUTTON (DEPUTY CHIEF), (LT) KEITH MCINTOSH, (LT) J. MCINTOSH, AND (LT) CHRIS MARTIN. ALL OF LAURENS COUNTY SHERIFF OFFICE TO PAY THE PLAINTIFF IN THE AMOUNT \$75,000.
- 17) COMPENSATORY DAMAGES IN THE AMOUNT OF \$50,000 AGAINST EACH DEFENDANT JOINTLY AND SEVERALLY.
- 18) PUNITIVE DAMAGES IN THE AMOUNT OF \$25,000 AGAINST EACH DEFENDANT.

- 19). A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY.
- 20). PLAINTIFF'S COSTS IN THIS SUIT.
- 21). ANY ADDITIONAL RELIEF THIS COURT DEEMS JUST, PROPER, AND EQUITABLE.

RESPECTFULLY,

DATED: DECEMBER 3, 2018

PRINT NAME: LEVITICUS YOUNG #311607
SIGNATURE: Leviticus Young

MA ROOM #210
LEIBER CORRECTIONAL INST.
P.O. BOX 205
RIDGEVILLE, S.C 29472